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Attorneys for Anne Elizabeth Burns, Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In Re: HOACTZIN PARTNERS, L.P., Debtor.	§ § § § § §	Case No. 19-33545-sgj7 Hearing Date: October 14, 2021 Hearing Time: 9:30 A.M.
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FEE APPLICATION COVER SHEET

Sixth Interim Application for Compensation of Petrostream, L.P. as Consultants for Trustee

For the time of May 1, 2021 through August 31, 2021

Capacity: Consultants for Trustee

Chapter: 7

Debtor: Hoactzin Partners, L.P.

Case No.: 19-33545

Retainer Received: \$0.00

Amount Previously Paid: \$306,712.48

Amount Requested:

Reductions:

Fees: \$145,478.14

Vol. Fee Reductions: \$0.00

Expenses: \$3,861.34

Expense Reductions: \$0.00

Other: \$0.00

Total Reductions: \$0.00

Total: \$149,339.48

/s/ Emily S. Wall
Emily Wall

September 22, 2021
Date

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In Re:	§	
	§	Case No. 19-33545-sgj7
HOACTZIN PARTNERS, L.P.,	§	
	§	Hearing Date: October 14, 2021
Debtor.	§	Hearing Time: 9:30 A.M.
	§	
	§	

**AMENDED SIXTH INTERIM APPLICATION FOR COMPENSATION OF
PETROSTREAM, L.P. AS CONSULTANTS FOR TRUSTEE**

A HEARING ON THIS AMENDED APPLICATION IS SCHEDULED TO BE HELD BEFORE THE HONORABLE BANKRUPTCY JUDGE, STACEY G. C. JERNIGAN, ON OCTOBER 14, 2021 AT 9:30 A.M., AT 1100 COMMERCE STREET, 14TH FLOOR, COURTROOM #1, DALLAS, TX 75242 OR VIA WEBEX VIDEOCONFERENCE, WHICH IS AT LEAST TWENTY-ONE (21) DAYS OR MORE FROM THE DATE OF SERVICE HEREOF.

THE WEBEX HEARING LINK MAY BE ACCESSED HERE:

<https://us-courts.webex.com/meet/jerniga>

ANY RESPONSE OR OBJECTION TO THE AMENDED APPLICATION MUST BE IN WRITING AND FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 1100 COMMERCE STREET, ROOM 1254, DALLAS, TX 75242-1496 AND A COPY MUST BE SERVED UPON APPLICANT ON OR BEFORE OCTOBER 13, 2021 WHICH DATE IS AFTER THE EXPIRATION OF 21 DAYS FROM THE DATE OF SERVICE HEREOF. IF NO OBJECTION OR RESPONSE IS TIMELY FILED, THE APPLICATION MAY BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE APPLICATION WITHOUT A

HEARING. IF AN OBJECTION OR RESPONSE IS TIMELY FILED AND THE HEARING DATE RESCHEDULED, NOTICE OF THE RESCHEDULED HEARING DATE AND TIME MAY ONLY BE GIVEN TO THOSE PARTIES FILING A WRITTEN OBJECTION OR RESPONSE TO THE APPLICATION.

Petrostream, L.P. (“Petrostream”), consultants for the Trustee in this bankruptcy case, files its Amended Sixth Interim Application for Compensation (the “Application”) for the period from May 1, 2021 through August 31, 2021 (the “Interim Application Period”).

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter under 28 U.S.C. §§ 1334 and 157(a); 11 U.S.C. §§ 330 and 331, and the standing order of reference. This is a “core” proceeding under 28 U.S.C. §157(b)(2)(A).

PROCEDURAL STATUS & FACTS RELEVANT TO APPLICATION

2. Hoactzin Partners, LP filed a voluntary chapter 11 bankruptcy petition on October 26, 2019. The case was converted to chapter 7 on February 12, 2020, and Anne Elizabeth Burns was appointed as chapter 7 trustee (the “Trustee”).

3. Hoactzin is the operator and majority working interest owner on four non-producing leases in the Gulf of Mexico. The leases have various wells, platforms, and pipelines on them, all of which needed to be plugged, abandoned, and/or decommissioned at the time of conversion.

4. Shortly after her appointment, the Trustee started the process of soliciting bids from qualified contractors to perform the necessary decommissioning. As that process progressed, the Trustee realized the need for an expert to assist her in soliciting appropriate turnkey bids for the multi-million-dollar project and to oversee the actual decommissioning work.

5. On May 1, 2020, the Trustee filed her Application to Employ Petrostream, L.P. as Consultants for the Trustee [Docket No. 140]. On June 19, 2020, the Order Granting Application to Employ Petrostream, L.P. [Docket No. 179] was entered by the Court approving the Applicant's employment.

PREVIOUS APPLICATIONS

10. On July 20, 2020, Petrostream filed its **First Interim Application for Compensation of Petrostream, L.P. as Consultants for Trustee** [Docket No. 200] seeking compensation and expenses of \$47,977.50.

11. On August 19, 2020, the **Order Approving First Interim Application for Compensation of Petrostream, L.P. as Consultant for Trustee** [Docket No. 246] was entered by the Court.

12. On September 11, 2020, Petrostream filed its **Second Interim Application for Compensation of Petrostream, L.P. as Consultants for Trustee** [Docket No. 256] seeking compensation and expenses of \$30,437.50.

13. On October 19, 2020, the **Order Approving Second Interim Application for Compensation of Petrostream, L.P. as Consultant for Trustee** [Docket No. 264] was entered by the Court.

14. On November 16, 2020, Petrostream filed its **Amended Third Interim Application for Compensation of Petrostream, L.P. as Consultants for Trustee** [Docket No. 267] seeking compensation and expenses of \$35,708.37.

15. On December 11, 2020, the **Order Approving Amended Third Interim Application for Compensation of Petrostream, L.P. as Consultant for Trustee** [Docket No. 278] was entered by the Court.

16. On March 1, 2021, Petrostream filed its **Fourth Interim Application for Compensation of Petrostream, L.P. as Consultants for Trustee** [Docket No. 294] seeking compensation and expenses of \$59,169.29.

17. On March 29, 2021, the **Order Approving Fourth Interim Application for Compensation of Petrostream, L.P. as Consultant for Trustee** [Docket No. 301] was entered by the Court.

18. On May 21, 2021, Petrostream filed its **Fifth Interim Application for Compensation of Petrostream, L.P. as Consultants for Trustee** [Docket No. 310] seeking compensation and expenses of \$133,419.82.

19. On July 1, 2021, the **Order Approving Fifth Interim Application for Compensation of Petrostream, L.P. as Consultant for Trustee** [Docket No. 315] was entered by the Court.

20. As of the date of filing this Sixth Interim Application the Trustee has fully paid the fees and expenses awarded in the First, Second, Third, Fourth and Fifth Interim Applications.

SIXTH INTERIM APPLICATION

21. During this Interim Application Period, Petrostream has continued to consult with and advise the Trustee and her other professionals regarding all technical and regulatory aspects of the decommissioning of Hoactzin's wells, platforms, and pipelines in the Gulf of Mexico.

22. Petrostream spent significant time during this Interim Application Period overseeing the Morrison team's ongoing decommissioning work pursuant to the terms of the contract as well as Morrison's efforts in securing all necessary permits from the appropriate government agencies. Petrostream inspectors have been engaged in the ongoing decommissioning projects offshore throughout this Interim Application Period. As of the filing

of this Interim Application, all Hoactzin structures have been removed from the Gulf of Mexico; all Hoactzin wells are fully plugged; all Hoactzin pipelines are abandoned in place; site clearance is complete at High Island 176A, High Island 176B, and West Delta 62; and site clearance is in process at Ship Shoal 144 and 145.

23. Petrostream's invoices for May, June, July, and August 2021 are attached hereto as **Exhibit A**. Petrostream has spent a total of 1,329.25 hours in this Interim Application Period assisting the Trustee.

24. Petrostream believes that the fees applied for herein are fair and reasonable in view of the time spent, the size, complexity and extent of the operation of the estate, the risks associated with this bankruptcy case, and the results obtained.

Petrostream prays for the Court to enter an Order authorizing the Trustee to pay Petrostream the sum of **\$149,339.48**, which includes \$145,478.14 for professional services and \$3,861.34 for expenses rendered during the Interim Application Period; and for such other and further relief as may be appropriate and just.

Respectfully submitted,
/s/ Emily S Wall
Emily S Wall
State Bar No. 24079534
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900 Jackson Street
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Phone: (214) 573-7307
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Attorneys for Anne Elizabeth Burns, Chapter 7 Trustee

and

/s/ Drew Hunger
Drew Hunger
Petrostream, L.P.

CERTIFICATION BY TRUSTEE

I, Anne Elizabeth Burns, the Chapter 7 Trustee in this case, hereby certify that I have read and approved this Amended Sixth Interim Application for fees and expenses.

Dated: September 22, 2021.

/s/ Anne Elizabeth Burns
Anne Elizabeth Burns, Trustee

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing amended Application was served on September 22, 2021 by electronic transmission through the Court's automated Case Management and Electronic Docketing System for the U. S. Bankruptcy Court for the Northern District of Texas, on all parties-in-interest submitting to service of papers in this case by said means and via first class mail, postage prepaid on the following parties:

U. S. Trustee
1100 Commerce St., Room 976
Dallas, TX 75242-1496

Honorable Bankruptcy Judge
Stacey G.C. Jernigan
Attn: Law Clerk
Earle Cabell Federal Building
1100 Commerce Street, 14th Floor
Dallas, Texas 75242

Anne Elizabeth Burns
900 Jackson Street, Suite 570
Dallas, TX 75202

Hudson M. Jobe
Timothy Andrew York
QSLWM, P.C.
2001 Bryan Street, Suite 1800
Dallas, TX 75201

/s/ Emily S. Wall
Emily S. Wall